

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PHARO GAIA FUND, LTD. and PHARO  
MACRO FUND, LTD., and PHARO  
TRADING FUND, LTD.,

Plaintiffs,

v.

THE BOLIVARIAN REPUBLIC OF  
VENEZUELA,

Defendant.

Case No. 20-cv-8497 (AT)  
Related to 18-cv-11940 (AT)

**DECLARATION OF MATTHEW D. MCGILL**

Pursuant to 28 U.S.C. § 1746, I, Matthew D. McGill, declare and state as follows:

1. I am an attorney with Gibson, Dunn & Crutcher LLP, counsel for Plaintiffs Pharo Gaia Fund, Ltd. Pharo Macro Fund, Ltd., and Pharo Trading Fund, Ltd. (“Plaintiffs”) in the above-referenced matter.

2. I submit this declaration on behalf of Plaintiffs in support of Plaintiffs’ Motion for Relief Pursuant to 28 U.S.C. § 1610(c), dated June 21, 2023.

3. On October 25, 2021, this Court entered default judgment in favor of Plaintiffs (the “Default Judgment”). Dkt. 32. Attached as Exhibit 1 hereto is a true and correct copy of the Default Judgment.

4. The Default Judgment has not been satisfied and, as of the date of this declaration, the Default Judgment remains outstanding. To my knowledge, Defendant Bolivarian Republic of Venezuela (“Venezuela”) has initiated no discussion concerning whole or partial satisfaction of the Default Judgment.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 22, 2022

/s/ Matthew D. McGill

Matthew D. McGill